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7
8 UNITED STATES DISTRICT COURT
9 CENTRAL DISTRICT COURT OF CALIFORNIA

10 ELIZBETH THOMAS,

Case No.: 2:22-CV-07989-SPG-JEM

11 Plaintiff,

12 vs. **AMENDED COMPLAINT**

13 BV LAKWOOD CARSON SE LLC, LOS
14 ANGELES COUNTY SHERIFF'S
15 DEPARTMENT

16 Defendant

17
18
19
20
21
22
23
24
25
26
27
28 AMENDED COMPLAINT - 1

1 JURISDICTION
2

3 The court must have federal subject jurisdiction as
4 well as personal jurisdiction to hear my case
5 according to the public counsel law center guide
6 prepared by public counsel. The defendant is not a
7 resident or citizen of California. I am suing the
8 defendant for something they did in California.

9 The defendant has consented to being sued in CA.
10 He registered to do business in California. The
11 defendants actions has put him at risk of being
12 sued in California. My complaint involves a federal
13 law. See Exhibit A. For federal question
14 jurisdiction, 28 U.S.C 1331 Federal Law
15 28 U.S.C 1331, section 1

16 There is diversity jurisdiction 28 U.S.C 1332
17 The defendant is a entity formed in Colorado.
18 Principal address is in Colorado and there is no
19 California street address for office.

20 Please see exhibit 2 for diversity jurisdiction

21 VENUE

22 The venue is correct because Los Angeles is a
23 county in the Central District of California.

24 A substantial part of the events that I am suing
25 for happened in this district. A substantial part
26 of the property I am suing over is located in this
27 district. I live in this district. Please see

28 AMENDED COMPLAINT [REDACTED]

1 Exhibit C for Venue.

2 PARTIES

3 The plaintiff is an individual who lives and does
4 business in the state of California. She is the
5 property owner of Worktough Inc, also known as
6 Moreno LLC. The defendant has sued her in superior
7 court for UNLAWFUL DETAINER. She was wrongfully
8 illegally removed from her home and office. She was
9 sued as a trespasser. At the time she had a quiet
10 lawsuit for quiet title,based off of adverse
11 possession filed in the federal court and the
12 superior court. The defendant is BV LAKWOOD CARSON
13 SE LLC, registered agent for process would be
14 Registered agents solutions,inc,mailing address
15 6400 S.FIDDLERS GREEN CIRCLE,SUITE1820 GREENWOOD
16 VILLAGE ,CO 80111

17 WILLIAM ROTHACKER

18 see Exhibit B for defendant information.

19 Defendant#2 is Los Angeles County Sheriff
20 Department. The address to their location is 5130
21 Clark Avenue,Lakewood,CA 90712
22 process address is 211 W. Temple St, Los Angeles,CA
23 90012. They are apart of the county governemnt.

24 FACTS

25 July 11,2022, the plaintiff was forced out of her
26 home and office. The defendants have been

27 AMENDED COMPLAINT

1 harrassing her and following her. They impounded
2 hermercedes benz and chevy tahoe. There were people
3 on the property and the plaintiff approached them
4 and asked them to not touch her stuff. They spit in
5 her face and made threats that scared her. She
6 drove away crying and she called the sheriffs to
7 make a report. The sheriffs called her and told her
8 that if she filed a report about the man spitting
9 in her face that she would go to jail. She has been
10 to jail 3 times for going back to her property and
11 there is no record to show of those arrest
12 happening except for a receipt from the sheriff
13 station property receipt. see Exhibit D for arrest
14 records. Defendant claims my vehicles were towed
15 after i went back to the property in September but
16 clearly kennys tow received the vehicles the day
17 after I was threatened off the ~~property was removed~~
18
19 Exhibit E shows when kennys tow came into
20 possession of the vehicles.

21 see Exhibit E-F
22 Exhibit F-shows paid. The opposing party sent my
23 colleague Bruce Kolacki \$1300 to his bank account to
24 get the tahoe out of the impound under the
25 conditions of removing my things from the property
26 as soon as i receive the vehicle. I received the
27 truck but did not remove my things that is why he
28

AMENDED COMPLAINT

1 did not send the money for the Mercedes to get
2 released because I did not follow through with his
3 plan. He tried to use my vehicles as leverage to
4 get me to abandon my building and property.

5 I have been harrassed since then. I sent all my
6 evidence to the judge on file and then the day of
7 trial my judge was switched to someone else. The
8 CRD in the courtroom said we dont usually hear
9 cases like yours but today we will make an
10 exception. A few days ago I was followed from the
11 property by a sheriff with his sirens on. He
12 followed me all the way inside the gate that I had
13 to open and then he backed out. I called the
14 station and asked if i could speak to the watch
15 commander and Luitenant Madonando said he did not
16 have any deputies dispatched to that location nor
17 did he see any record of any deputies sent out to
18 the location i was followed to.

19
20 I ask the watch commander to tell his deputies to
21 leave me and my husband alone. Today is January
22 20,2023, I just got out of the hospital. I was in
23 intensive care unit for a day and then they
24 transferred me down stairs for 2 days. I almost
25 died the day the deputy had followed me with his
26 sirens on. I fear for my life.

27 REQUEST FOR RELIEF

28 AMENDED COMPLAINT

1 Plaintiff requests the court grant her a order for
2 protective order against the defendants.
3

4 Plaintiff requests this order state that the
5 defendants pay her for the hardship she has endured
6 while litigation has been pending.
7

8 to pay a total of \$10,000. For not complying to a
9 court ordered subpeona and for harrassment.
10

11 Any further relief the court may find appropriate.
12

13 DEMAND FOR A JURY TRIAL
14

15 Plaintiff hereby request a jury trial on
16 all issues raised in this complaint.
17

18 DATED: January 20, 2023
19

20 signed : *Elizabeth Thomas*
21

22 Printed: *Elizabeth Thomas*
23

24 Elizabeth Thomas
25

26 Plaintiff
27

28 AMENDED COMPLAINT

14TH AMENDMENT

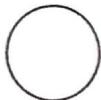
EXHIBIT A FEDERAL Question Jurisdiction
28 U.S.C § 1331

Federal Law

Citizenship Rights, Equal Protection, Apportionment, Civil War Debt

Signing Details

More in The Constitution



Share

Section 1

All persons born or naturalized in the United States, and subject to the jurisdiction thereof, are citizens of the United States and of the State wherein they reside. No State shall make or enforce any law which shall abridge the privileges or immunities of citizens of the United States; nor shall any State deprive any person of life, liberty, or

property, without due process of law; nor deny to any person within its jurisdiction the equal protection of the laws.

Section 2

Representatives shall be apportioned among the several States according to their respective numbers, counting the whole number of persons in each State, excluding Indians not taxed. But when the right to vote at any election for the choice of electors for President and Vice-President of the United States, Representatives in Congress, the Executive and Judicial officers of a State, or the members of the Legislature thereof, is denied to any of the male inhabitants of such State, being twenty-one years of age, and citizens of the United States, or in any way abridged, except for participation in rebellion, or other crime, the basis of representation therein shall be reduced in the proportion which the number of such male citizens shall bear to the whole number of male citizens twenty-one years of age in such State.

Section 3

No person shall be a Senator or Representative in Congress, or elector of President and Vice-President, or hold any office, civil or military, under the United States, or under any State, who, having previously taken an oath, as a member of Congress, or as an officer of the United States, or as a member of any State legislature, or as an executive or judicial officer of any State, to support the Constitution of the United States, shall have engaged in insurrection or rebellion against the same, or given aid or comfort to the enemies thereof. But Congress may by a vote of two-thirds of each House, remove such disability.



STATE OF CALIFORNIA
Office of the Secretary of State
STATEMENT OF INFORMATION
LIMITED LIABILITY COMPANY
 California Secretary of State
 1500 11th Street
 Sacramento, California 95814
 (916) 653-3516

BA20220797281

For Office Use Only

-FILED-

File No.: BA20220797281

Date Filed: 9/2/2022

EXHIBIT B

Diversity Jurisdiction 28 U.S.C §1332

B1072-9377 09/02/2022 2:49 PM Received by California Secretary of State

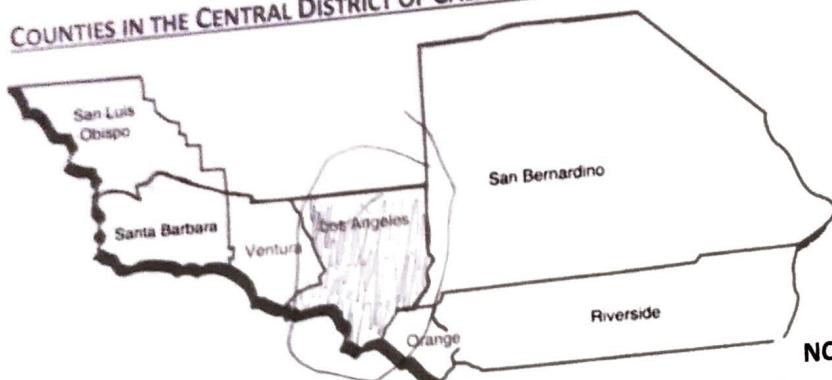
Entity Details		
Limited Liability Company Name	BV LAKWOOD CARSON SE LLC	
Entity No.	202033510647	
Formed In	COLORADO	
Street Address of Principal Office of LLC		
Principal Address	6400 S FIDDLERS GREEN CIRCLE, SUITE 1820 GREENWOOD VILLAGE, CO 80111	
Mailing Address of LLC		
Mailing Address	6400 S FIDDLERS GREEN CIRCLE, SUITE 1820 GREENWOOD VILLAGE, CO 80111	
Attention		
Street Address of California Office of LLC		
Street Address of California Office	None	
Manager(s) or Member(s)		
Manager or Member Name	Manager or Member Address	
WILLIAM R ROTHACKER	6400 S FIDDLERS GREEN CIRCLE, SUITE 1820 GREENWOOD VILLAGE, CO 80111	
Agent for Service of Process		
California Registered Corporate Agent (1505)	REGISTERED AGENT SOLUTIONS, INC. Registered Corporate 1505 Agent	
Type of Business		
Type of Business	REAL ESTATE	
Email Notifications		
Opt-in Email Notifications	No, I do NOT want to receive entity notifications via email. I prefer notifications by USPS mail.	
Chief Executive Officer (CEO)		
CEO Name	CEO Address	
	None Entered	
Labor Judgment		
No Manager or Member of this Limited Liability Company has an outstanding final judgment issued by the Division of Labor Standards Enforcement or a court of law, for which no appeal therefrom is pending, for the violation of any wage order or provision of the Labor Code.		
Electronic Signature		
<input checked="" type="checkbox"/> By signing, I affirm under penalty of perjury that the information herein is true and correct and that I am authorized by California law to sign.		
TROY ALLEN, AUTHORIZED FILER		09/02/2022
Signature		Date

EXHIBIT C - Venue



Venue: Am I Suing in the Right Location?

COUNTIES IN THE CENTRAL DISTRICT OF CALIFORNIA



- Los Angeles County
- Orange County
- Riverside County
- San Bernardino County

- San Luis Obispo County
- Santa Barbara County
- Ventura County

START HERE

Did a substantial part of the events you are suing about happen in this district?

YES

NO

Is a substantial part of the property you are suing over located in this district?

YES

NO

Do all of the defendants live in California?

YES

Does at least one of the defendants you are suing live in this district?

YES

NO

NO

You are probably in the

**Wrong
Venue**

NO

Are you suing the U.S. government or a federal official or agency in their official capacity?

YES

Do you live in this district?

NO

YES

If this court has subject matter jurisdiction AND personal jurisdiction, you are probably in the

**Correct
Venue**

Case 2:22-cv-07989-SPG-JEM Document 1 Filed 11/02/22 Page 38 of 44 Page ID #:38

LOS ANGELES COUNTY JAIL
BOOKING AND PROPERTY
RECORD

EXH BTP

BOOKING NO. 6455511	LOC. BKG LKD	DR. LIC. NO. E104159	STATE CA
ARRESTEE'S NAME LAST THOMAS	FIRST ELIZABETH	MIDDLE MARIA	

PRISONER'S RECORDS

	YES	NO
HAVE AIDS	<input type="checkbox"/>	<input checked="" type="checkbox"/>
HAVE VI	<input type="checkbox"/>	<input checked="" type="checkbox"/>
HAVE HEPATITIS	<input type="checkbox"/>	<input checked="" type="checkbox"/>
HAVE TB	<input type="checkbox"/>	<input checked="" type="checkbox"/>
EVER HAVE TB	<input type="checkbox"/>	<input checked="" type="checkbox"/>

AGY. OR DETAIL ARRESTING 1301	DATE & TIME ARRESTED 09-01-2022 0300	TIME BKG.	
LOCATION OF ARREST 11747 CARSON STREET, LAKWOOD		TOTAL BAIL 5000	
CHARGE 419PC / M / RETAKE LAND AFTER LEGAL REMOVAL		WARR/COMM. NO N/A	
JAIL LOC. LKD	ARRAIGN DATE 09-02-2022	TIME 0830	COURT BELLFLOWER

PRISONERS SIGNATURE WHEN BOOKED
XLOCATION OR DISPOSITION OF VEHICLE
LEFT AT LOCATION

CASH RETAINED 0.00	PROPERTY CLOTHING WORN
------------------------------	----------------------------------

PRISONERS SIGNATURE WHEN BOOKED

CASH DEPOSITED 0.00	PROPERTY (2) BLK SHOES, SHOE LACES, CELL PHONE, KEYS
-------------------------------	--

EYE GLASS FRAMES ONLY, DEBIT CARD, INHALER BLK BRA

PRISONERS SIG. FOR REC'T OF REMAINING CASH & PROPERTY

XBulk Property: **Nope** **Yes**

Thomas J. S.

Pink - Prisoner's Copy

Exhibit 5

www.ezLien
2022-01921NOTICE OF PENDING LIEN SALE FOR VEHICLE VALUED \$4000 OR LESS
(Civil Code Sect. 3072)

TO WHOM IT MAY CONCERN:

This is to notify you that I intend to sell this vehicle at a Lien Sale (public sale) because my towing, storage or repair bill has not been paid. You may wish to take one of the following actions:

1. Pay my bill and reclaim the vehicle before the sale date.
2. Stop the Sale and dispute the lien in court. You may stop the sale by completing the Declaration of Opposition below and forwarding this notice to the DMV in the enclosed envelope within 10 days of the date this notice was mailed.
3. Disregard this notice if you no longer own or want this vehicle so I can proceed with the sale. However, if you are the last owner of record, you may be liable for removal and disposition costs and lien not satisfied by sale of the vehicle.

Page ID #27

Page 37 of 44

Page 11/02/22

Page 1 Filed 11/02/22

Page 1 Document 1

Case 2:22-cv-07989-SPG-JEM

DECLARATION
OF
OPPOSITION

(Must be sent to
DMV within 10
days of date
notice of sale
mailed)

PRINT TRUE FULL NAME
ADDRESS
MAILING ADDRESS IF DIFFERENT FROM ABOVE

I certify (or declare) under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

DATE SIGNATURE
X

ATTENTION! This Declaration of Opposition will not be valid unless you have signed, provided your true full name and a valid address. If the lienholder is unable to serve you with a court action, he/she will be allowed to continue with the lien sale (Civil Code 3072).

NOTE TO THE LIENHOLDER:

This notice is to be sent to the registered owner, legal owner, Department of Motor Vehicles, and any other person interested in this vehicle, 31 to 41 days before the date of sale (do not count day notice mailed). Send notice certified mail, return receipt requested, or U.S. Postal Service Certificate of Mailing.

EXCEPTION: Notice to the department must be sent by certified mail, return receipt requested.

At least 10 days before the sale, a copy of this notice shall be posted in a conspicuous place on the premises of the business office of the lienholder, and if the sale occurs at a place other than the business office, a notice must be posted at the site of the forthcoming sale.

REGISTERED OWNER

HUNTER NEITH ANDRINA/
KLEIMAN ROBERT A
14271 JEFFREY RD 509
IRVINE, CA 92620

LEGAL OWNER

Certified # to DMV: 7020 0090 0001 9435 2875
Department of Motor Vehicles
Lien Sale Unit
P.O. Box 932317
Sacramento, CA 94232-3170

INTERESTED PARTIES

KOLACKI BRUCE
20827 NORWALK BLVD APT 39
LAKWOOD, CA 90715

